

# EXHIBIT 1

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 RASIER, LLC; and RASIER-CA, LLC

11 *[Additional Counsel Listed on Signature Page]*

12 **UNITED STATES DISTRICT COURT**  
 13 **NORTHERN DISTRICT OF CALIFORNIA**  
 14 **SAN FRANCISCO DIVISION**

15  
 16 IN RE: UBER TECHNOLOGIES, INC.,  
 17 PASSENGER SEXUAL ASSAULT  
 18 LITIGATION

19 This Document Relates to:

20 ALL ACTIONS

Case No. 3:23-md-03084-CRB

**DEFENDANTS UBER TECHNOLOGIES, INC.,  
 RASIER LLC AND RASIER-CA, LLC'S  
 RESPONSES TO PLAINTIFFS' SECOND SET  
 OF INTERROGATORIES**

Judge: Hon. Lisa J. Cisneros  
 Courtroom: G – 15th Floor

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1        2.     Responding Party objects to the definitions of “Uber,” “You,” “Your,” and “Yourself”  
2 as vague, ambiguous, overbroad, unduly burdensome, and seeking information that is not relevant to  
3 the claims and defenses in this Action to the extent they refer to “parents, divisions, departments,  
4 subsidiaries, affiliates, predecessors, successors, present or former officers, directors, owners,  
5 members, partners, principals, agents, employees, contractors, subcontractors, administrators,  
6 attorneys, experts, investigators, consultants, joint venturers, licensors, and all other Persons acting or  
7 purporting to act on its behalf.” Responding Party is responding only on behalf of the named  
8 defendants.

9        **OBJECTIONS AND RESPONSES TO SECOND SET OF INTERROGATORIES**

10        **INTERROGATORY NO. 1:**

11        For each month in the year 2017, specify by category, the number of Sexual Violence Incidents  
12 in the United States that YOU categorized into each of the 21 categories in Uber’s Sexual Misconduct  
13 and Sexual Violence Taxonomy or categorized as “Insufficient Information” or “Parent Category  
14 Usage Tracking.”

15        **RESPONSE NO. 1:**

16        Responding Party objects to this Interrogatory as unduly burdensome and harassing in that it  
17 seeks to compel the creation of new analyses and documents that do not exist. Responding Party  
18 further objects to the definition of the term “Sexual Violence Incident” as argumentative and  
19 confusing. Responding Party also objects to the definition of the term “YOU” as vague, ambiguous,  
20 overbroad, unduly burdensome, and seeking information that is not relevant to the claims and defenses  
21 in this Action to the extent they refer to “parents, divisions, departments, subsidiaries, affiliates,  
22 predecessors, successors, present or former officers, directors, owners, members, partners, principals,  
23 agents, employees, contractors, subcontractors, administrators, attorneys, experts, investigators,  
24 consultants, joint venturers, licensors, and all other Persons acting or purporting to act on its behalf.”  
25 Responding Party is responding only on behalf of the named defendants. Subject to and without  
26 waiving the foregoing objections, Responding Party responds that it served Plaintiffs with information  
27 responsive to this Interrogatory on April 17 and April 23, 2025 in two documents titled “Information  
28

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1 Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025” and “Supplemental  
2 Information Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025.”

3 **INTERROGATORY NO. 2:**

4 For each month in the year 2018, specify by category, the number of Sexual Violence Incidents  
5 in the United States that YOU categorized into each of the 21 categories in Uber’s Sexual Misconduct  
6 and Sexual Violence Taxonomy or categorized as “Insufficient Information” or “Parent Category  
7 Usage Tracking.”

8 **RESPONSE NO. 2:**

9 Responding Party objects to this Interrogatory as unduly burdensome and harassing in that it  
10 seeks to compel the creation of new analyses and documents that do not exist. Responding Party  
11 further objects to the definition of the term “Sexual Violence Incident” as argumentative and  
12 confusing. Responding Party also objects to the definition of the term “YOU” as vague, ambiguous,  
13 overbroad, unduly burdensome, and seeking information that is not relevant to the claims and defenses  
14 in this Action to the extent they refer to “parents, divisions, departments, subsidiaries, affiliates,  
15 predecessors, successors, present or former officers, directors, owners, members, partners, principals,  
16 agents, employees, contractors, subcontractors, administrators, attorneys, experts, investigators,  
17 consultants, joint venturers, licensors, and all other Persons acting or purporting to act on its behalf.”  
18 Responding Party is responding only on behalf of the named defendants. Subject to and without  
19 waiving the foregoing objections, Responding Party responds that it served Plaintiffs with information  
20 responsive to this Interrogatory on April 17 and April 23, 2025 in two documents titled “Information  
21 Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025” and “Supplemental  
22 Information Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025.”

23 **INTERROGATORY NO. 3:**

24 For each month in the year 2019, specify by category, the number of Sexual Violence Incidents  
25 in the United States that YOU categorized into each of the 21 categories in Uber’s Sexual Misconduct  
26 and Sexual Violence Taxonomy or categorized as “Insufficient Information” or “Parent Category  
27 Usage Tracking.”

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**1 RESPONSE NO. 3:**

2 Responding Party objects to this Interrogatory as unduly burdensome and harassing in that it  
3 seeks to compel the creation of new analyses and documents that do not exist. Responding Party  
4 further objects to the definition of the term “Sexual Violence Incident” as argumentative and  
5 confusing. Responding Party also objects to the definition of the term “YOU” as vague, ambiguous,  
6 overbroad, unduly burdensome, and seeking information that is not relevant to the claims and defenses  
7 in this Action to the extent they refer to “parents, divisions, departments, subsidiaries, affiliates,  
8 predecessors, successors, present or former officers, directors, owners, members, partners, principals,  
9 agents, employees, contractors, subcontractors, administrators, attorneys, experts, investigators,  
10 consultants, joint venturers, licensors, and all other Persons acting or purporting to act on its behalf.”  
11 Responding Party is responding only on behalf of the named defendants. Subject to and without  
12 waiving the foregoing objections, Responding Party responds that it served Plaintiffs with information  
13 responsive to this Interrogatory on April 17 and April 23, 2025 in two documents titled “Information  
14 Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025” and “Supplemental  
15 Information Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025.”

**16 INTERROGATORY NO. 4:**

17 For each month in the year 2020, specify by category, the number of Sexual Violence Incidents  
18 in the United States that YOU categorized into each of the 21 categories in Uber’s Sexual Misconduct  
19 and Sexual Violence Taxonomy or categorized as “Insufficient Information” or “Parent Category  
20 Usage Tracking.”

**21 RESPONSE NO. 4:**

22 Responding Party objects to this Interrogatory as unduly burdensome and harassing in that it  
23 seeks to compel the creation of new analyses and documents that do not exist. Responding Party  
24 further objects to the definition of the term “Sexual Violence Incident” as argumentative and  
25 confusing. Responding Party also objects to the definition of the term “YOU” as vague, ambiguous,  
26 overbroad, unduly burdensome, and seeking information that is not relevant to the claims and defenses  
27 in this Action to the extent they refer to “parents, divisions, departments, subsidiaries, affiliates,  
28

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1 predecessors, successors, present or former officers, directors, owners, members, partners, principals,  
2 agents, employees, contractors, subcontractors, administrators, attorneys, experts, investigators,  
3 consultants, joint venturers, licensors, and all other Persons acting or purporting to act on its behalf.”  
4 Responding Party is responding only on behalf of the named defendants. Subject to and without  
5 waiving the foregoing objections, Responding Party responds that it served Plaintiffs with information  
6 responsive to this Interrogatory on April 17 and April 23, 2025 in two documents titled “Information  
7 Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025” and “Supplemental  
8 Information Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025.”

9 **INTERROGATORY NO. 5:**

10 For each month in the year 2021, specify by category, the number of Sexual Violence Incidents  
11 in the United States that YOU categorized into each of the 21 categories in Uber’s Sexual Misconduct  
12 and Sexual Violence Taxonomy or categorized as “Insufficient Information” or “Parent Category  
13 Usage Tracking.”

14 **RESPONSE NO. 5:**

15 Responding Party objects to this Interrogatory as unduly burdensome and harassing in that it  
16 seeks to compel the creation of new analyses and documents that do not exist. Responding Party  
17 further objects to the definition of the term “Sexual Violence Incident” as argumentative and  
18 confusing. Responding Party also objects to the definition of the term “YOU” as vague, ambiguous,  
19 overbroad, unduly burdensome, and seeking information that is not relevant to the claims and defenses  
20 in this Action to the extent they refer to “parents, divisions, departments, subsidiaries, affiliates,  
21 predecessors, successors, present or former officers, directors, owners, members, partners, principals,  
22 agents, employees, contractors, subcontractors, administrators, attorneys, experts, investigators,  
23 consultants, joint venturers, licensors, and all other Persons acting or purporting to act on its behalf.”

24 Responding Party is responding only on behalf of the named defendants. Subject to and without  
25 waiving the foregoing objections, Responding Party responds that it served Plaintiffs with information  
26 responsive to this Interrogatory on April 17 and April 23, 2025 in two documents titled “Information  
27 Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025” and “Supplemental

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1 Information Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025.”

2 **INTERROGATORY NO. 6:**

3 For each month in the year 2022, specify by category, the number of Sexual Violence Incidents  
4 in the United States that YOU categorized into each of the 21 categories in Uber’s Sexual Misconduct  
5 and Sexual Violence Taxonomy or categorized as “Insufficient Information” or “Parent Category  
6 Usage Tracking.”

7 **RESPONSE NO. 6:**

8 Responding Party objects to this Interrogatory as unduly burdensome and harassing in that it  
9 seeks to compel the creation of new analyses and documents that do not exist. Responding Party  
10 further objects to the definition of the term “Sexual Violence Incident” as argumentative and  
11 confusing. Responding Party also objects to the definition of the term “YOU” as vague, ambiguous,  
12 overbroad, unduly burdensome, and seeking information that is not relevant to the claims and defenses  
13 in this Action to the extent they refer to “parents, divisions, departments, subsidiaries, affiliates,  
14 predecessors, successors, present or former officers, directors, owners, members, partners, principals,  
15 agents, employees, contractors, subcontractors, administrators, attorneys, experts, investigators,  
16 consultants, joint venturers, licensors, and all other Persons acting or purporting to act on its behalf.”  
17 Responding Party is responding only on behalf of the named defendants. Subject to and without  
18 waiving the foregoing objections, Responding Party responds that it served Plaintiffs with information  
19 responsive to this Interrogatory on April 17 and April 23, 2025 in two documents titled “Information  
20 Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025” and “Supplemental  
21 Information Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025.”

22 **INTERROGATORY NO. 7:**

23 For each month in the year 2023, specify by category, the number of Sexual Violence Incidents  
24 in the United States that YOU categorized into each of the 21 categories in Uber’s Sexual Misconduct  
25 and Sexual Violence Taxonomy or categorized as “Insufficient Information” or “Parent Category  
26 Usage Tracking.”

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1 **RESPONSE NO. 7:**

2 Responding Party objects to this Interrogatory as unduly burdensome and harassing in that it  
3 seeks to compel the creation of new analyses and documents that do not exist. Responding Party  
4 further objects to the definition of the term “Sexual Violence Incident” as argumentative and  
5 confusing. Responding Party also objects to the definition of the term “YOU” as vague, ambiguous,  
6 overbroad, unduly burdensome, and seeking information that is not relevant to the claims and defenses  
7 in this Action to the extent they refer to “parents, divisions, departments, subsidiaries, affiliates,  
8 predecessors, successors, present or former officers, directors, owners, members, partners, principals,  
9 agents, employees, contractors, subcontractors, administrators, attorneys, experts, investigators,  
10 consultants, joint venturers, licensors, and all other Persons acting or purporting to act on its behalf.”  
11 Responding Party is responding only on behalf of the named defendants. Subject to and without  
12 waiving the foregoing objections, Responding Party responds that it served Plaintiffs with information  
13 responsive to this Interrogatory on April 23, 2025 in a document titled “Information Provided by  
14 Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025, Regarding Categorization of  
15 Reports of Sexual Assault or Sexual Misconduct Incidents Alleged to Have Occurred in 2023 or 2024,”  
16 and incorporates it herein: On April 4, 2025, the Parties agreed that Defendants would provide  
17 numbers, with caveats, for the categorization of incident reports for the years 2017-2022, as requested  
18 by Interrogatories Nos. 1-6 from Plaintiffs’ Second Set of Interrogatories. While Interrogatories Nos.  
19 7-8 from Plaintiffs’ Second Set of Interrogatories seek similar information for the years 2023 and  
20 2024, the Parties’ agreement did not include a similar requirement for Defendants to provide numbers  
21 for the years 2023 and 2024. Instead, during the Parties’ conferrals, Defendants explained their  
22 objection to providing numbers for the years 2023 and 2024, and Plaintiffs requested, and the Parties  
23 agreed, that Defendants would provide that reason in writing, which Defendants provide here. [REDACTED]

24 [REDACTED]

25 [REDACTED]

26 **INTERROGATORY NO. 8:**

27 For each month in the year 2024, specify by category, the number of Sexual Violence Incidents

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1 in the United States that YOU categorized into each of the 21 categories in Uber’s Sexual Misconduct  
2 and Sexual Violence Taxonomy or categorized as “Insufficient Information” or “Parent Category  
3 Usage Tracking.”

4 **RESPONSE NO. 8:**

5 Responding Party objects to this Interrogatory as unduly burdensome and harassing in that it  
6 seeks to compel the creation of new analyses and documents that do not exist. Responding Party  
7 further objects to the definition of the term “Sexual Violence Incident” as argumentative and  
8 confusing. Responding Party also objects to the definition of the term “YOU” as vague, ambiguous,  
9 overbroad, unduly burdensome, and seeking information that is not relevant to the claims and defenses  
10 in this Action to the extent they refer to “parents, divisions, departments, subsidiaries, affiliates,  
11 predecessors, successors, present or former officers, directors, owners, members, partners, principals,  
12 agents, employees, contractors, subcontractors, administrators, attorneys, experts, investigators,  
13 consultants, joint venturers, licensors, and all other Persons acting or purporting to act on its behalf.”

14 Responding Party is responding only on behalf of the named defendants. Subject to and without  
15 waiving the foregoing objections, Responding Party responds that it served Plaintiffs with information  
16 responsive to this Interrogatory on April 23, 2025 in a document titled “Information Provided by  
17 Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025, Regarding Categorization of  
18 Reports of Sexual Assault or Sexual Misconduct Incidents Alleged to Have Occurred in 2023 or 2024,”  
19 and incorporates it herein: and incorporates it herein: On April 4, 2025, the Parties agreed that  
20 Defendants would provide numbers, with caveats, for the categorization of incident reports for the  
21 years 2017-2022, as requested by Interrogatories Nos. 1-6 from Plaintiffs’ Second Set of  
22 Interrogatories. While Interrogatories Nos. 7-8 from Plaintiffs’ Second Set of Interrogatories seek  
23 similar information for the years 2023 and 2024, the Parties’ agreement did not include a similar  
24 requirement for Defendants to provide numbers for the years 2023 and 2024. Instead, during the  
25 Parties’ conferrals, Defendants explained their objection to providing numbers for the years 2023 and  
26 2024, and Plaintiffs requested, and the Parties agreed, that Defendants would provide that reason in  
27 writing, which Defendants provide here. [REDACTED]

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**INTERROGATORY NO. 9:**

Identify the “200 gender-based violence prevention experts” referenced in the introduction (page 9) of Uber’s 2017-2018 U.S. Safety Report.

**RESPONSE NO. 9:**

Responding Party objects to the definition of the term “Uber” as vague, ambiguous, overbroad, unduly burdensome, and seeking information that is not relevant to the claims and defenses in this Action to the extent they refer to “parents, divisions, departments, subsidiaries, affiliates, predecessors, successors, present or former officers, directors, owners, members, partners, principals, agents, employees, contractors, subcontractors, administrators, attorneys, experts, investigators, consultants, joint venturers, licensors, and all other Persons acting or purporting to act on its behalf.” Responding Party is responding only on behalf of the named defendants. Subject to and without waiving the foregoing objections, Responding Party responds that page 9 of its 2017-2018 U.S. Safety Report refers to “more than 200 gender-based violence prevention experts,” not “200 gender-based violence prevention experts.” Responding Party further responds by identifying the following organizations:

**Organizations**

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